REMARKS

Claims 14-19 have been allowed and claim 10 is indicated to contain allowable subject matter.

Rejection of claims 1-9 and 11-13

Claims 1-3, 5-9, and 11-13 were again rejected as in the previous office action as upatentable over Shotbolt in view of Thiebaud, except that this action refers to Shotbolt as teaching one or more catenary risers 18 (fig. 2; col. 3, lines 54-60); and does not assert that Thiebaud teaches steel catenary risers. Applicant respectfully traverses the rejection and requests reconsideration.

Column 3, line 55 of Shotbolt recites the freehanging catenary 18 below the support 3. However, while this riser may be suspended in a catenary curve, it is not a **steel** catenary riser; rather it is a flexible pipe riser as disclosed by Shotbolt. Shotbolt does not disclose a steel catenary riser and a flexible riser does not meet or suggest the claim.

Shotbolt discloses at col. 3, lines 8-9 that the flexible pipe 10 is lowered from a reel 12. The skilled artisan readily recognizes that flexible riser is different from steel catenary riser. While both may possibly be supplied from a reel, flexible riser is consistent with the flexible pipe jumpers extending from the buoyancy device to a surface production facility in the invention. They are generally composite materials, not steel catenary risers. See the websites for flexible pipe producers at www.technip.com (at Subsea Products, see Flexible Pipe) and www.wellstream.com (see Flexible Pipe, Introduction) for exemplary materials.

The invention is directed to the use of a combination of flexible pipe jumpers and steel catenary risers in conjunction with a variable buoyancy device, not flexible pipe strand passing over a support, as given by Shotbolt. The steel catenary risers are better suited for the significant hydrostatic pressure of the deepwater zone while the flexible pipe is better suited for the wave zone. See the disclosure at **[0003]**. Accordingly, the teaching of Shotbolt is at best inferior to the invention or possibly untenable in deepwater hydrocarbon productions. In any case steel catenary risers are not taught in Shotbolt or Thiebaud.

The Examiner is also directed to the disclosure at **[0024]** for the importance of the use of a variable buoyancy device in combination with both SCRs in the deepwater and flexible risers in the wave zone. The buoyancy of the device is varied during assembly of the riser combination, according to the weight suspended.

In view of the above, it would not have been obvious to the skilled artisan to arrive at the invention from the teachings of Shotbolt and Thiebaud. Neither directed their inventions to the combination of risers in conjunction with a variable buoyancy device above a hybrid riser tower to assemble a production that has hydrostatic pressure-resistant steel catenary riser use in deepwater and flexible pipe use in the wave zone. Since neither reference shows SCRs as required by the claims, reconsideration and allowance of all claims is solicited.

While claim 4 was further rejected over de Baan for its teaching of fluid transfer system, the rejection of this claim is also improper since the SCR is not taught in the primary references or in de Baan.

Reconsideration and a notice of allowance of all claims are respectfully requested.

Respectfully submitted,

John F. Hunt, Reg. No. 29,394

c/oExxonMobil Upstream Research Company
P.O. Box 2189
CORP-URC-SW348
Houston, Texas 77252-2189

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Margaret Gnewuch

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